

ATTACHMENT B

CPUC Comments to FCC's NPRM	
<p>Questions for comment re: FCC Notice of Proposed Rulemaking Empowering Consumers to Prevent & Detect Billing for Unauthorized Charges; Consumer Information and Disclosure; Truth-in-Billing and Billing Format :</p>	<p>D.10-10-034, Final Decision Adopting California Telephone Corporation Billing Rules, General Order (GO) 168, Part 4</p>
<p>Disclosure of Blocking 3rd Party Charges Para. 40. We propose that wireline carriers that offer subscribers the option to block 3rd party charges from their telephone bills must clearly and conspicuously notify subscribers of this option at the point of sale, on each bill, and on their websites.</p> <p>Para. 41. We seek comment on whether wireline carriers could be required to clearly and conspicuously explain to consumers that their bills may include charges from third-party providers when they provide consumers with information on the blocking option at the point of sale, on each bill, and on the carrier's website.</p>	<p>GO 168, Part 4, Rule 5. Responsibilities of Billing Telephone Corporations: At service initiation, all Billing Telephone Corporations shall disclose to Subscribers that the Billing Telephone Corporation has opted to provide billing and collection services to Third Parties and that such charges may be placed on the Subscriber's bill, absent action by the Subscriber...Billing Telephone Corporations must remind Subscribers in writing no less than once each calendar year that third-party charges may be placed on the bill and of the option to block such charges at anytime and at no additional cost.</p> <p>GO 168, Part 4, Rule 5: The Billing Telephone Corporation shall explain the blocking option in neutral terms and shall not attempt to influence the Subscriber's decision.</p>
<p>Para. 42. We seek comment on whether the disclosure should include identification of the specific kinds or categories of charges that would be blocked, and how those kinds or categories of charges should be described, as well as whether and how the disclosure should advise consumers of the charge, if any for the blocking service.</p>	<p>GO 168, Part 4, Rule 5. Responsibilities of Billing Telephone Corporations: The Billing Telephone Corporation shall explain the blocking option in neutral terms and shall not attempt to influence the Subscriber's decision.</p>
<p>Para. 42. We seek comment on the need to modify such notifications to ensure that they are clear and conspicuous, and otherwise informative, to specific population groups, such as people with disabilities, people with limited English proficiency, and those living in Native Nations on Tribal lands, and in Native communities, such as Hawaiian Home</p>	<p>Cal. Pub. Util. Code §2890(b): [...]Written or oral solicitation materials used to obtain an order for a product or service shall be in the same language as the written order.</p>

<p>Lands. What is the most effective manner to ensure that the availability of this option is made apparent to consumers in a cost effective manner for carriers?</p>	
<p>Para. 44. We seek comment on whether wireline carriers that offer blocking should be prohibited from charging an additional fee for doing so.</p>	<p>GO 168 Part 4, Rule 5. Responsibilities of Billing Telephone Corporations: The Billing Telephone Corporation shall not charge for blocking and must allow Subscribers to add or remove this feature quickly and easily.</p>
<p>Measures to Assist Consumers in Detecting Cramming Para. 46. We seek comment on whether or not we should require separate billing sections for charges from 3rd party vendors.</p>	<p>Cal. Pub. Util. Code §2890(d)(1): A billing telephone company shall clearly identify and use a separate billing section for, each person, corporation, or billing agent that generates a charge on a subscriber's telephone bill.</p>
<p>Para. 48. We seek comment on whether more specific requirements are needed: Would it be useful to consumers to have charges from 3rd party vendors separately listed or highlighted on the 1st page of the telephone bill or to have these charges highlighted in some other fashion? Is there any need to require identification of the 3rd party vendor associated each charge in a manner different from or in addition to the requirement in the Truth-in-Billing rules for clear-and-conspicuous identification of the biller associated with each charge?</p>	<p>Cal. Pub. Util. Code §2890(d)(1): A billing telephone company shall clearly identify, and use a separate billing section for, each person, corporation, or billing agent that generates a charge on a subscriber's telephone bill. A billing telephone company may not bill for a person, corporation, or billing agent, unless that person, corporation or billing agent complies with paragraph (2). (2) Any person, corporation, or billing agent that charges subscribers for products or services on a telephone bill shall do all of the following: (A) Include, or cause to be included, in the telephone bill the amount being charged for each product or service, including any taxes or surcharges, and a clear and concise description of the service, product, or other offering for which a charge has been imposed. (B)[...] (C) Establish, maintain, and staff a toll-free telephone number to respond to questions or disputes about its charges and to provide the appropriate addresses to which written questions or complaints may be sent. The person, corporation, or billing agent that generates a charge may also contract with a third party, including, but not limited to, the billing telephone corporation, to provide that service on behalf of the person, corporation or billing agent. (D) Provide a means for expeditiously resolving subscriber disputes over charges for a product or service, the purchase of which was not authorized by the subscriber.</p>

<p>Disclosure of Commission Complaint Contact Information to Enhance the Ability of Consumers to Resolve Cramming Disputes</p> <p>Para. 51. We seek comment on a requirement that each wireline telephone bill, as well as the customer service section of each wireline carrier’s website, include a clear and conspicuous statement indicating that consumer inquiries and complaints may be submitted to the Commission. This statement should include: Commission’s telephone # for complaints, website address for filing complaints, and, if located on the provider’s website, a direct link to the Commission’s webpage for filing complaints.</p>	<p>Cal. Pub. Util. Code §2890(d)(2)(B): [...] Each telephone bill shall include the appropriate telephone number of the commission that a subscriber may use to register a complaint.</p>
<p>Wireless Service</p> <p>Para. 52. We propose that CMRS carriers be required to include clear and conspicuous statements indicating that consumer inquires and complaints may be submitted to the Commission and provide Commission contact information for submission of complaints on carrier telephone bills and websites.</p>	<p>Cal. Pub. Util. Code §2890(d)(2)(B): [...] Each telephone bill shall include the appropriate telephone number of the commission that a subscriber may use to register a complaint.</p>
<p>Para. 53. We seek comment on whether any of the other proposed rules for wireline carriers be applied to CMRS carriers, whether they are inapplicable or unnecessary in the CMRS context and why.</p>	<p>CPUC’s cramming rules treat wireline and wireless the same.</p>
<p>Para. 53. If record supports applying rules to CMRS, how should the language of the rules in Appendix A be amended to apply them to CMRS carriers?</p>	<p>CMRS rules should apply no differently.</p> <p>GO 168 Part 4, Rule 5. Responsibilities of Billing Telephone Corporations: Wireless Billing Telephone Corporations shall explain at service initiation in clear and concise written terms that the Subscriber’s line is open to charges from third-party Service Providers and that the Subscriber has the option to block these charges.</p>
<p>Para. 54. We seek comment on whether current industry practices or voluntary industry guidelines can address any cramming issues successfully, and, if not, what additions or modifications could make them an effective alternative to expanded Commission regulation. To what extent and how are industry guidelines and practices evolving to</p>	<p>See CPUC Decision D.10-10-034, at 28-29. Industry voluntary guidelines have not worked due to the volume of wireless cramming. As a result, the CPUC developed anti-cramming reporting rules for wireless industry to allow CPUC staff to understand the magnitude of the problem.</p>

address new issues, such as in-application marketing?	
<p>Disclosure of Third-Party Vendor Contact Information</p> <p>Para. 55. We seek comment on requiring the carrier generating the telephone bill to clearly and conspicuously provide the contact information for each third-party vendor in association with that entity's charges. We also seek comment on the specific contact information, such as the name of the third-party vendor and its toll-free customer service telephone number, that should be provided.</p>	<p>Cal. Pub.Util. Code §2890 requires a billing telephone company to clearly identify, and use a separate billing section for, each person, corporation, or billing agent that generates a charge.</p>
<p>Para. 58. In addition, we seek comment on requiring the carrier generating the telephone bill initially and periodically thereafter to verify that the contact information for third-party vendors on its telephone bills is correct. If so, what should the nature and scope of the verification be?</p>	<p>GO 168, Part 4, Rule 5. Responsibilities of Billing Telephone Corporations: The Billing Telephone Corporation bears ultimate responsibility for all items presented in a Subscriber's bill and must take the following measures to ensure that only authorized charges from lawful Billing Agents and Service Providers are included in the bill.</p>
<p>Requiring Wireline Carriers to Disclose That They Do Not Offer Blocking of Third-Party Charges</p> <p>Para. 59. We seek comment on whether wireline carriers that do not offer consumers the option to block third-party charges from their telephone bills should be required to disclose the fact that they do not offer it. We also seek comment on how, where, and when the disclosures should be made. Should the disclosure be clear and conspicuous? Should it, like the disclosures by carriers that do offer blocking, be made at the point of sale, on each bill, and on carrier websites? Should disclosures include information about the extent to which third-party charges may appear on telephone bills? Should anything else be included in the disclosure, such as the potential cost of cramming to subscribers?</p>	<p>The FCC should require <i>all</i> carriers to offer blocking of third-party charges.</p> <p>GO 168, Part 4, Rule 5. Responsibilities of Billing Telephone Corporations: At service initiation, all Billing Telephone Corporations shall disclose to Subscribers that the Billing Telephone Corporation has opted to provide billing and collection services to Third Parties and that such charges may be placed on the Subscriber's bill, absent action by the Subscriber.</p>
<p>Requiring Wireline Carriers to Block Third-Party Charges Upon Request</p> <p>Para. 60. We seek comment on whether wireline carriers should be required to block third-party charges from subscribers'</p>	<p>GO 168, Part 4, Rule 5. Responsibilities of Billing Telephone Corporations:</p> <p>At service initiation, all Billing Telephone Corporations shall disclose to Subscribers that the Billing Telephone</p>

<p>telephone bills upon request and, if so, whether carriers should be prohibited from charging an additional fee for doing so. We seek comment on any technical, cost, or other barriers that exist, as well as on which carriers offer blocking, what specific types or categories of charges are blocked (<i>e.g.</i> charges from non-carriers, from presubscribed carriers, from carriers other than presubscribed carriers, for vertical services), whether an additional charge applies for blocking, the amount of the charge, if any, and how the amount of the charge was determined.</p>	<p>Corporation has opted to provide billing and collection services to Third Parties and that such charges may be placed on the Subscriber's bill, absent action by the Subscriber.</p> <p>Wireless Billing Telephone Corporations shall explain at service initiation in clear and concise written terms that the Subscriber's line is open to charges from third-party Service Providers and that the Subscriber has the option to block these charges. The Billing Telephone Corporation shall not charge for blocking and must allow Subscribers to add or remove this feature quickly and easily. Billing Telephone Corporations must remind Subscribers in writing no less than once each calendar year that third-party charges may be placed on the bill and of the option to block such charges at anytime and at no additional cost. The Billing Telephone Corporation shall explain the blocking option in neutral terms and shall not attempt to influence the Subscriber's decision.</p>
<p>Para. 61. We also seek comment on what kind or types of charges should be subject to blocking if wireline carriers were required to block them. For example, should the block prevent inclusion on a telephone bill of all charges other than those from the carrier generating the bill? Should charges from presubscribed carriers be permitted, but not charges from carriers to which the billed consumer does not presubscribe? Should only charges from non-carriers be blocked? Should charges from non-carrier affiliates, such as Internet Service Providers, be blocked? Should bundles be treated differently and, if so, how?</p>	<p>GO 168, Part 4, Rule 5. Responsibilities of Billing Telephone Corporations: For wireline Billing Telephone Corporations, this option to block third-party services shall not extend to any services they are required by law to provide, such as the option to purchase long distance services from a competitor, or services or products offered by their affiliates.</p>
<p>Due Diligence Para. 64. We seek comment on whether we should require carriers, before contracting or agreeing with a third-party vendor to place its charges on customer telephone bills, to screen each such vendor to ensure that it has operated and will continue to operate in compliance with all relevant state and federal laws. We seek comment on the nature and adequacy of current practices in this regard. We also seek comment on how carriers are currently monitoring and tracking customer complaints with respect to cramming. We</p>	<p>GO 168, Part 4, Rule 4. Billing for Authorized Charges Only:</p> <p>Billing Telephone Corporations shall bill Subscribers only for authorized charges. Billing Telephone Corporations shall adopt protocols which prohibit Billing Agents and Service Providers from submitting, directly or indirectly, charges for billing through a Billing Telephone Company that the Subscriber has not authorized. Billing Telephone Corporations must monitor or cause to be monitored, either directly or through a Billing Agent, or other entity, each Service Provider's continuing compliance with this requirement. Such monitoring shall include review of the</p>

<p>further seek comment on how such vendors could change or improve their efforts to effectively monitor and track customer complaints with respect to cramming.</p>	<p>Service Provider’s marketing materials, scripts, customer verification records, or other such information as may be necessary to demonstrate that the Service Provider is obtaining valid Subscriber authorizations.</p> <p>GO 168, Part 4, Rule 5. Responsibilities of Billing Telephone Corporations:</p> <p>Prior to approving a Service Provider or Billing Agent for the provision of billing services, the Billing Telephone Corporation shall directly or through another entity conduct a reasonable inquiry of the Service Provider’s or Billing Agent’s history of violations of state or federal law or rules relating to consumer protection and current ability to operate lawfully.</p>
<p>Para. 64. In addition, we seek comment on what, if any, thresholds exist with respect to customer complaints of this nature, as a trigger to adverse action against a third party. Should such thresholds be required? If so, what should the threshold limit be? For example, should it be associated with the number of complaints received or otherwise related to the aggregate dollar value of the claims in the complaints received? Do carriers monitor the percentage of refunds, unbillable charges, or uncollectible charges associated with third-party vendors as a means of identifying vendors that may be engaged in cramming or for which the carrier otherwise may seek to cease billing? What percentage of charges from third-party vendors are refunded annually? What % is uncollectible? What percentage is unbillable? What are the reasons a charge from a third party might be unbillable?</p>	<p>G.O. 168, Part 4, Rule 6. Monitoring of Subscriber Billings:</p> <p>Each Billing Telephone Corporation is responsible for monitoring the billings it controls for the purpose of preventing and detecting unauthorized charges, and for the prompt termination of billing services to Billing Agents and Service Providers that present unauthorized charges. Each Billing Telephone Corporation shall have in place and comply with a protocol for identifying unauthorized charges and suspending or terminating billing services to any Billing Agent or Service Provider that has submitted unauthorized charges.</p>
<p>Para. 65. To what extent do carriers attempt to identify these kinds of arrangements (fraudulent third-party vendor affiliations/intertwined companies)? How successful have carriers been at identifying them and ceasing to bill for them? Can carriers effectively discover whether an entity is part of such an arrangement, especially given that the owners or operators likely will attempt to conceal such</p>	<p>G.O. 168, Part 4, Rule 6. Monitoring of Subscriber Billings:</p> <p>Each Billing Telephone Corporation is responsible for monitoring the billings it controls for the purpose of preventing and detecting unauthorized charges, and for the prompt termination of billing services to Billing Agents and Service Providers that present unauthorized charges. Each Billing Telephone Corporation shall have in place and comply with a protocol for identifying unauthorized charges and suspending or terminating billing services to any</p>

<p>arrangements from carriers? Are there similarities among these companies or other characteristics that may make such arrangements easily or readily discoverable by billing aggregators or carriers? We seek comment regarding penalties or other measures that carriers and billing aggregators employ to deter third-party vendors from engaging in cramming or generating consumer complaints. How could these be improved? Are there more effective measures, and what are they? We also seek comment regarding the number of third-party vendors and billing aggregators that submit charges to carriers for billing on telephone bills? We further seek comment on the kinds of business (such as by line of business or type of product) in which third-party vendors actually or purportedly engage and the number of third-party vendors engaged in each kind of business. How many real parties in interest are there owning or operating these third-party vendors? How could this info. be obtained and updated?</p>	<p>Billing Agent or Service Provider that has submitted unauthorized charges.</p>
<p>Para. 66. Should wireline and CMRS carriers report trends or spikes in complaints they receive relating to specific third-party vendors to the appropriate federal or state regulatory agency? We seek comment on these and any other specific proposals that will better assist us in identifying and taking enforcement action against parties who engage in the practice of cramming.</p>	<p>GO 168, Part 4. Reporting Requirements:</p> <p>For Wireline:</p> <p>Rule 11.3</p> <p>All wireline Billing Telephone Corporations and their Billing Agents shall create a calendar month summary report which shall include the following information:</p> <ol style="list-style-type: none"> the total number of consumer complaints received each month for each Service Provider and Billing Agent; Billing Telephone Corporations shall report the name, address, and telephone number of each entity receiving complaints, excluding Billing Agents; the total number of working telephone numbers billed for each entity for which complaints were received; for Billing Agents, the total number of subscribers billed by each Service Provider for which complaints were received; for Billing Telephone Corporations, the total number of

	<p>Subscribers billed by each Service Provider for which the Billing Telephone Corporation directly bills and each billing agent;</p> <p>e. for Billing Agents, the total dollars billed by each Service Provider; for Billing Telephone Corporation, the total dollars billed by each Service Provider for which the Billing Telephone Corporation directly bills and each Billing Agent.</p> <p>Rule 11.4 If a Billing Telephone Corporation terminates a Billing Agent or Service Provider for any reason, it shall notify the Director of the Commission's Consumer Protection and Safety Division within 10 business days of the termination date. The notification shall include the identity of the Service Provider or Billing Agent and any principals and the reason(s) for the termination.</p> <p>For Wireless: Rule 11.1 All wireless Billing Telephone Corporations shall create a calendar month summary report every quarter listing refunds made to Subscribers with California area codes for charges originated by Service Providers. The report of refunds shall be summarized by Service Provider and contain the following information:</p> <ul style="list-style-type: none"> a. Name of Service Provider b. Name of Billing Agent (if any) c. Description of service provided d. Total number of purchases by Subscribers e. Total amount billed by the Billing Telephone Corporation on behalf of the Service Provider f. Total number refunds to Subscribers g. Total amount refunded by the Billing Telephone Corporation <p>Rule 11.2 All wireless Billing Telephone Corporations shall create a calendar month summary report every quarter listing all third party services that have been suspended or terminated. These services shall include, but are not limited to, Premium short messaging service (SMS) campaigns. The</p>
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	<p>report of suspensions and terminations shall not include services that are complete or otherwise expired and may be based on national data. The report of suspensions and terminations shall be summarized by Service Provider and contain the following information:</p> <ol style="list-style-type: none"> Name and contact information of Service Provider Description of service that was suspended or terminated Whether service was suspended or terminated Reason for suspension or termination. If the service is suspended, the date or conditions for reinstatement should be included.
<p>Accessibility Para. 68. We also seek comment on how our proposed rules will affect, or could be improved to better assist, people with disabilities, people living in Native Nations on Tribal lands and in Native communities, and people with limited English proficiency.</p>	<p>GO 168, Part 4, Rule 13. Consumer Education: All Billing Telephone Corporations who offer third-party billing and collection services shall cooperate with the Telecommunications Division and the Consumer Protection and Safety Division and participate in meetings and workshops for the purpose of developing materials to educate consumers on how to avoid having unauthorized charges placed on bills. The workshop, shall not only develop content for the CalPhoneInfo web site maintained by the Commission, but also shall discuss actions taken by the Billing Telephone Corporations to inform consumers of the ability to block third-party services and their related charges.</p>
<p>Definition of Service Provider or Service Para. 70. We seek comment on the need to define “service provider” or “service” in Subpart Y of Part 64 to better address charges that arguably may not be for a service. We seek comment on specific definitions of “service provider” and “service” that may be effective in preventing cramming.</p>	<p>GO 168, Part 4, Rule 2.3 Definitions. “Service Provider”: A person or entity, other than a Billing Telephone Corporation, that originates the charge or charges that are billed to the Subscriber of the Billing Telephone Corporation.</p>
<p>Para. 71. We also seek comment on alternatives, such as changing the Truth-in-Billing rules, including as modified by our proposed rules, to refer to more than services and service providers. We seek comment on which rules would need to be changed and the specific changes that would be needed.</p>	<p>GO 168, Part 4, Rule 4. Billing for Authorized Charges Only: Billing Telephone Corporations shall bill Subscribers only for authorized charges. Billing Telephone Corporations shall adopt protocols which prohibit Billing Agents and Service Providers from submitting, directly or indirectly, charges for billing through a Billing Telephone Company that the subscriber has not authorized. Billing</p>

	Telephone Corporations must monitor or cause to be monitored, either directly or through a Billing Agent, or other entity, each Service Provider's continuing compliance with this requirement.
<p>Effective Consumer Information Disclosure</p> <p>Para. 75. We seek comment on the best ways to ensure that the forms of disclosure required by our proposed rules will actually benefit consumers. We seek comment on the extent to which consumers may be expected to utilize the additional information called for by these proposed rules. Further, we seek comment on any considerations regarding the manner by which the proposed rules are implemented that would increase the number of consumers who will benefit and the nature of the benefits. In particular, we seek comment on the best ways to ensure that disclosure of third-party charges on bills is clear and conspicuous; that third-party blocking options are clearly disclosed; and that FCC contact information is provided in ways that consumers will see it and know how to use it. We also seek comment on best-practices models of consumer disclosure in other areas, best-practices means of assessing the effectiveness of disclosures (such as online tests or focus groups), or other examples, research, and recommendations that would be applicable here.</p>	<p>GO 168, Part 4 Rule 5. Responsibilities of Billing Telephone Corporations: At service initiation, all Billing Telephone Corporations shall disclose to subscribers that the Billing Telephone Corporation has opted to provide billing and collection services to Third Parties and that such charges may be placed on the subscriber's bill, absent action by the subscriber....Billing Telephone Corporations must remind Subscribers in writing no less than once each calendar year that third-party charges may be placed on the bill and of the option to block such charges at anytime and at no additional cost.</p> <p>GO 168, Part 4, Rule 12. Ongoing Collaboration With Staff: Representatives from the Consumer Protection and Safety Division and the Telecommunications Division shall meet at least annually with all wireless Billing Telephone Corporations who offer third-party services to their customers to discuss recent developments in the wireless industry regarding cramming issues and any Commission concerns regarding cramming.</p> <p>GO 168, Part 4, Rule 13. Consumer Education: All Billing Telephone Corporations who offer third-party billing and collection services shall cooperate with the Telecommunications Division and the Consumer Protection and Safety Division and participate in meetings and workshops for the purpose of developing materials to educate consumers on how to avoid having unauthorized charges placed on bills. The workshop, shall not only develop content for the CalPhoneInfo web site maintained by the Commission, but also shall discuss actions taken by the Billing Telephone Corporations to inform consumers of the ability to block third-party services and their related charges.</p>
<p>Para. 78. We seek comment on the extent of cramming, the total of all charges and all unauthorized charges from third-party vendors, and the total amount of unauthorized charges wireline and CMRS consumers are billed or pay annually, as well as amounts credited annually to consumers for allegedly unauthorized charges and amounts of</p>	<p>Decision D.10-10-034, Discussion Section 5.1 states "Despite the existence of GO168, and extensive efforts by this Commission and our staff, along with the carriers, the record shows that unauthorized charges continue to vex California telecommunications customers. DRA presented Commission records from deeply frustrated customers showing unauthorized charges that reappear on monthly bills despite extensive time and effort to dispute the</p>

uncollectible charges. Because unauthorized charges can and often do go undetected for long periods of time, we seek comment on methodologies to extrapolate or otherwise quantify the total amount of unauthorized charges accurately. We seek comment on how and by how much our proposed rules may reduce these charges and credits. We seek comment on other costs of cramming to consumers, too, such as costs of monitoring bills to guard against cramming, costs of obtaining services to block third-party charges, and costs associated with resolving disputes over unauthorized charges. These costs may include out-of-pocket costs and less tangible costs, such as time. We seek comment on the amount of such costs, as well as how and by how much our proposed rules may reduce them.

charges. The U.S. District Court opinion describes this ‘vulnerable underbelly’ and finds the market ‘under-regulated’.”

D.10-10-034, Discussion Section 5.4 states “The record shows that customers do not carefully check bills and often pay small charges, even if unauthorized, due to the time and inconvenience of disputing the charge. Ensuring comprehensive refunds for all unauthorized charges are available is essential to removing the reward for unauthorized billing. . . Billing Telephone Corporations must prevent or detect what the federal court called ‘fraudsters’ from surreptitiously placing charges on many bills, cheerfully refunding to those that complain, and pocketing the payments from the unsuspecting.”

GO 168, Part 4, Rule 6. Monitoring of Subscriber Billings: Each Billing Telephone Corporation is responsible for monitoring the billings it controls for the purpose of preventing and detecting unauthorized charges, and for the prompt termination of billing services to Billing Agents and Service Providers that present unauthorized charges. Each Billing Telephone Corporation shall have in place and comply with a protocol for identifying unauthorized charges and suspending and terminating billing services to any Billing Agent or Service Provider that has submitted unauthorized charges.

GO 168, Part 4, Rule 10. Record Retention for Refunds: The Billing Telephone Corporation is ultimately responsible for refunding all unauthorized charges collected from its subscribers, including those subscribers who may have mistakenly paid the unauthorized charges and not requested a refund. Every Billing Telephone Corporation and Billing Agent shall maintain accurate and up-to-date records of all billings Service Providers sufficient to demonstrate compliance with these rules and to facilitate customer refunds. Such records shall be retained for not less than twenty-four months.

GO 168, Part 4, Rule 11.1. Reporting Requirements: All wireless Billing Telephone Corporations shall create a calendar month summary report every quarter listing refunds made to Subscribers with California area codes for charges originated by Service Providers.

	GO 168, Part 4, Rule 11.2: All wireless Billing Telephone Corporations shall create a calendar summary report every quarter listing all third party services that have been suspended or terminated.
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